

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

KENNON BRADFORD,

Plaintiff,

v.

UNITED STATES OF AMERICA, et al.,

Defendant.

Case No. 17-03060-QV-S-BP-P

MOTION FOR APPOINTMENT OF PRO BONO COUNSEL

Comes now, Kennon Bradford, (herein Plaintiff), pursuant to 28 U.S.C. § 1915(d) for the appointment of pro bono counsel. See Johnson v. Williams, 788 F.2d 1319, 1322-23(8th Cir. 1986); Nelson, 728 F.2d at 1005.


RELATIVE FACTS

Plaintiff is a federal prisoner, registry number 26436-034, housed at MCFP Springfield, Mo., and currently is in the Segregated Housing Unit (SHU) for disciplinary reasons. Although, Plaintiff has access to the law library, he cannot rely upon the help of the library clerk to further assist in the litigation of his meritorious FTCA claim. That said, recently on February 21, 2018, the Court granted the Defendant's motion to dismiss, or in the alternative, motion for summary judgment. Doc. 12. However, the Court denied the Defendant's motion for summary judgment as to dismissal of the FTCA. As such, the Court found A) A fact-finder could reasonably find Defendants' conduct fell below an exercise of reasonable care; A.1) A genuine issue of material fact exists as to the condition of the walking track; A.2) Defendants are not entitled to judgment as a matter of law on the assertion that they had no knowledge of an alleged defect on the track; A.3) Defendants are not entitled to judgment as a matter of law as to

causation B) A genuine issue of material fact exists as to whether the condition of the track were open and obvious. Doc. 18. In light of these developments, the Plaintiff respectfully request the appointment of pro bono counsel for his benefit and that of the Court for equitable and expeditious disposition of this civil matter in a timely fashion.

Executed 8 March 2018,

Respectfully submitted,



Kennon Bradford, Pro Se
#26436-034

Certificate of Service

I, Kennon Bradford, (herein Plaintiff), do certify under penalty of perjury in §1746 that the foregoing Motion for Appointment of Pro Bono Counsel is true and correct and that a pre-postage paid copy was submitted to the Prison Mail for delivery to the Clerk at, 400 East 9th Street, Room 1510, Kansas City, Mo. 64106 for service upon the Court and the USATTYS' Office.

Executed 8 March 2018,

Respectfully,


Kennon Bradford, Pro Se
#26436-034
MCFP Springfield
P.O. Box 4000
Springfield, MO 65801

Mr. Kennon Bradford
#26436-034
Medical Center for Federal Prisoners
P.O. Box 4000
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U.S. District Court
Room 1510
400 East 9th Street
Kansas City, MO 64106

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